



November 28, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: COMPLIANCE LETTER
WC Docket No. 05-196**

Dear Secretary Dortch:

SkyPix details below its compliance with the Federal Communications Commission's VoIP 911 Order and 47 C.F.R. § 9.5.

Routing of 911 Calls

SkyPix provides interconnected VoIP service to the residents of two buildings in Minneapolis, Minnesota. One building is located at 250 Park Ave., and the other building is located at 4540 Snelling Ave. So. SkyPix subscribers use their customer premises equipment (CPE) to place and receive calls. A subscriber's call to 911 travels from the subscriber's CPE by wireline to an interactive assistive device (IAD) located in the subscriber's building where it is sent on a dedicated line to a T-1 located on the premises of Onvoy.

Onvoy provides 911 services to SkyPix customers in the same manner 911 services are provided to customers subscribing to "traditional" voice services. Fully redundant physically diverse IP Softswitches are located in carrier class central office facilities. Should a SkyPix subscriber dial 911, the IP Softswitch will route the call to Onvoy's redundant PSTN connected gateways.

From those gateways, the call will be transmitted over Onvoy's traditional PSTN switching infrastructure. Based on the calling number, the PSTN switch will route the 911 call over the correct trunk to the appropriate selective router maintained by Qwest or Independent Emergency Services (IES), both of which maintain connectivity to the majority of PSAPs throughout the state of Minnesota. The selective router then will route the call to the appropriate PSAP serving the subscriber's Registered Location.

Transmission of ANI and Registered Location Information

SkyPix provides enhanced 911 location information to Onvoy for all of their subscribers upon service activation and in an on-going manner.

Onvoy maintains its own E911 automatic location information (ALI) database which contains the location information for all SkyPix subscribers. Changes to information contained in the Onvoy E911 ALI database are communicated daily to IES and Qwest, the two ALI database providers in Minnesota. And Onvoy maintains fully redundant, diverse path DS1s for connectivity to all twelve Selective Routers in the State of Minnesota.

Onvoy can currently provide E911 call completion with the subscriber's correct ANI, with the ALI database accurately reflecting the registered location for 100% of our subscribers. Onvoy provides address validation prior to populating information in the E911 database via the master street address guide (MSAG).

SkyPix only provides VoIP service in locations where Onvoy can provide E911 call completion in the manner identified above. Requests for VoIP services outside of Onvoy's local voice service footprint are denied. All of SkyPix existing subscribers were required to provide registered location information prior to service turn-up, and SkyPix will continue this practice for all new customers.

Initial Location Information

SkyPix interconnected VoIP service is only available to persons located in the two buildings where SkyPix provides service. A subscriber's registered location information is obtained at the time the subscriber contracts for service, which is then provided to Onvoy for inclusion in the appropriate ALI database. All subscribers (100%) have provided their registered location information to SkyPix, and that information has been provided to Onvoy.

Updated Registered Location Information

SkyPix interconnected VoIP service is not nomadic. All subscribers must use the CPE in their registered location for service. If a subscriber moves from the registered location in a building to another location in the building, service is not available unless the subscriber requests that SkyPix provide service at the new location, at which time SkyPix obtains the updated location information and provides it to Onvoy. If the subscriber moves out of the building, SkyPix service is not available at all.

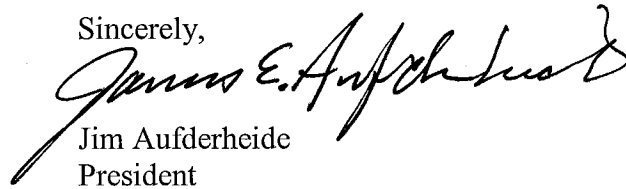
Notification, Acknowledgment, and Labeling

SkyPix mailed a notice to all subscribers (100%) of the circumstances under which E911 service may be limited or unavailable, which is during power outages, broadband interruptions, or if SkyPix service is disconnected. All subscribers (100%) have also been sent labels warning them of the circumstances where E911 service may be limited or unavailable, with instructions to place the labels on or near their CPE. All but two of SkyPix 16 subscribers have sent back a

written acknowledgement of the notice, and SkyPix has a record of these acknowledgments. SkyPix is in the process of contacting the two remaining subscribers to obtain their acknowledgment.

If there are any issues or questions regarding SkyPix compliance, please contact me at 952-767-4060, or Amanda Midtling at 952-767-4092.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Aufderheide", with a stylized flourish at the end.

Jim Aufderheide
President